

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	NO. 4:20-CR-157-P
	§	
CLINTON BATTLE (01), and	§	
DONNA GREEN (02),	§	
	§	
Defendants.	§	

DEFENDANT CLINTON BATTLE'S EXPERT DESIGNATIONS

TO THE HONORABLE MARK T. PITTMAN,
UNITED STATES DISTRICT JUDGE FOR THE
NORTHERN DISTRICT OF TEXAS

COMES NOW, **CLINTON BATTLE (1)**, Defendant, by and through his attorneys of record, LANCE EVANS and WM. REAGAN WYNN, and pursuant to FED. R. CRIM. PROC. 16, provides this written designation of expert witnesses under Rules 702 and 703 of the Federal Rules of Evidence:

1) Robert R. Bulger, M.D.

Dr. Bulger is a medical doctor who has practiced extensively in the field of pain management and is board certified by the American Board of Medical Specialties in pain management and

anesthesiology. Dr. Bulger may testify regarding the usual course of professional practice, legitimate medical purposes, clinical medical practice generally, patient education and the prescribing of controlled substances, including but not limited to hydrocodone, codeine, alprazolam, tramadol, phentermine, and Qsymia. Dr. Bulger may testify in rebuttal to government experts Tricia Aultman, M.D., Stephen Sudderth, M.D., Kristy Smith, and Susannah Herkert, depending on the contents of their testimony. Dr. Bulger's testimony will be based on his education, training, and experience.

2) Angela Miller

Ms. Miller is the President and General Manager of Medical Auditing Solutions, LLC. She is a certified in medical coding and healthcare compliance. She may testify regarding industry standards for medical billing and Current Procedural Terminology (CPT) codes, their requirements, and guidelines for use of CPT codes. She may testify in rebuttal to government witness Martha Luevano, depending on her testimony. Ms. Miller's testimony will be based on her education, training, and experience.

3) Chris J. Dellinges, CPA, CRFAC, CFE

Mr. Dellinges is a Certified Public Accountant, Certified Forensic Accountant, and Certified Fraud Examiner. He may testify

about his review of Dr. Battle's bank records and other financial records provided by the Government in discovery. Mr. Dellinges' testimony will be based on his education, training, and experience.

4) Gilberto Torrez

Mr. Torrez is a licensed Private Investigator in the State of Texas. He served for more than twenty years as an FBI Special Agent and has been assigned to the New Orleans, Dallas, FBI Field Divisions, as well as the U.S. Embassy in the Republic of Panama as a Legal Attaché. Mr. Torrez has particularized training and expertise in various law enforcement practices and cases involving alleged illegal drug distribution. Mr. Torrez may testify about law enforcement practices and "street" trade in various controlled substances. He may testify in rebuttal to government experts Kristy Smith, Susannah Herkert, Rick Loftis, Tyler Fleming, and Jaime Swartwood. Mr. Torrez's testimony will be based on his education, training, and experience.

5) Jane H. Buckner, MGA/QDE

Ms. Buckner is a Master Graphologist and has testified as an expert in state and federal courts in many cases during the last four decades. Ms. Buckner may testify regarding handwriting

comparison analysis. Ms. Buckner's testimony will be based on her education, training, and experience.

Respectfully Submitted,

/s/ Lance Evans

LANCE EVANS

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/s/ Wm. Reagan Wynn

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ATTORNEYS FOR CLINTON BATTLE

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2021, I electronically filed the foregoing document using the Court's CM/ECF system, thereby effecting service on all counsel of record.

/s/ Wm. Reagan Wynn

WM. REAGAN WYNN